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December 1, 2000

The Honorable Carol Browner  
Administrator  
U.S. Environmental Protection Agency  
Ariel Rios Building  
Room 3000, #1101-A  
1200 Pennsylvania Ave., N.W.  
Washington, DC 20460

Subject: Comments on Silane, [3-(2,3-epoxypropoxy)propyl]trimethoxy Test Plan

Dear Administrator Browner:

The following comments on the test plan for Silane, [3-(2,3-epoxypropoxy)propyl]trimethoxy are submitted on behalf of the Physicians Committee for Responsible Medicine, People for the Ethical Treatment of Animals, the Humane Society of the United States, the Doris Day Animal League, and Earth Island Institute. These animal protection and environmental organizations have a combined membership of more than nine million Americans.

The Silicones Environmental, Health and Safety Council has presented robust summaries that adequately address each health endpoint of the SIDS battery and therefore appropriately has not called for more tests. Silane, [3-(2,3-epoxypropoxy)propyl]trimethoxy has been tested on many animals and any further testing on animals would not contribute to the understanding of its toxicity.

Although the test plan presents a thoughtful analysis of existing data, the Silicones Environmental, Health and Safety Council failed to compare this compound to other similar chemicals. Many silica-containing organic compounds share physico-chemical properties, such as instability in water, and grouping them for analysis may be appropriate. We are still awaiting the EPA's response to our repeated requests for information on how it intends to foster cooperation in the development of chemical categories so that unnecessary, expensive, and poorly conceived testing is avoided.

I can be reached via telephone at 202-686-2210, ext. 302, or via e-mail at <[ncardello@pcrm.org](mailto:ncardello@pcrm.org)>. Correspondence should be sent to my attention at the following address: PCRM, 5100 Wisconsin Ave., Suite 404, Washington, DC 20016.

Sincerely,

Nicole Cardello, MHS  
Research Coordinator